

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**P.M.I. SERVICES NORTH AMERICA,
INC.**

PLAINTIFF

V.

**ENDURO PIPELINE SERVICES, INC.,
DEFENDANT**

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CIVIL ACTION NO. 3:16-cv-00442-PRM

PLAINTIFF'S FIRST AMENDED TRIAL WITNESS LIST

Plaintiff P.M.I. Services North America, Inc. submits this list of witnesses who may or will be called to testify at the trial of the above-captioned matter as follows:

1. Custodian of Records
Buckeye Partners Texas Pipe Line Company, L.P., now known as
Buckeye Development & Logistic II, LLC ("Buckeye")
One Greenway Plaza, Suite 880 Houston,
Texas 77046
(832) 615-8600

The custodian of records of Buckeye is familiar with the manner in which its records are created and maintained by virtue of their duties and responsibilities and is expected to provide testimony consistent therewith.

2. Custodian of Records
Integrity Testing & Inspection, Inc.
6410 Airport Road Suite D/E
El Paso, TX 79925
(915) 772-1800

The custodian of records of Integrity Testing & Inspection, Inc. is familiar with the manner in which its records are created and maintained by virtue of their duties and responsibilities and is expected to provide testimony consistent therewith.

3. Custodian of Records
Rosen USA
14120 Interdrive East
Houston, Texas 77032
(281) 442-8282

The custodian of records of Rosen USA is familiar with the manner in which its records are created and maintained by virtue of their duties and responsibilities and is expected to provide testimony consistent therewith.

4. Hank Austin
Buckeye Development and Logistics, LLC;
One Greenway Plaza, Suite 880 Houston,
Texas 77046
(832) 615-8600

Mr. Austin is an employee of Buckeye who has knowledge regarding the damage caused by Enduro's tool to the pipeline, the work performed on the pipeline at issue and the cost to repair the damage to the pipeline due to the movement of the magnets both past and future. He is expected to testify regarding same.

5. Christian Carcamo (by deposition)
Rosen USA
14120 Interdrive East
Houston, Texas 77032
(281) 442-8282

Mr. Carcamo is an employee of Rosen USA who has knowledge regarding Rosen USA's inability to complete an inline inspection on the pipeline at issue in 2015 due to the presence and movement of the magnets in the pipeline. He is expected to provide testimony explaining what Rosen USA observed when attempted to complete an inline inspection in 2015 and the basis for Rosen USA's decision not to complete the inline inspection.

6. Dale Corbello
Buckeye Development and Logistics, LLC;
One Greenway Plaza, Suite 880 Houston,
Texas 77046
(832) 615-8600

Mr. Corbello is an employee of Buckeye who has knowledge regarding the damage caused by Enduro's tool to the pipeline, the work performed on the pipeline at issue, the bid process for the 2015 inline inspection, the vendors that decided not to bid on the inline inspection due to the presence of the magnets and the cost to repair the damage to the pipeline due to the movement of the magnets both past and future. Mr. Corbello further has knowledge of conversations with Enduro personnel related to the work it performed on the pipeline as well as conversations with Rosen USA regarding its refusal to complete an inline inspection in 2015. He is expected to provide testimony regarding same.

7. Sterling Fountain
Buckeye Development and Logistics, LLC
One Greenway Plaza, Suite 880 Houston,
Texas 77046
(832) 615-8600
(832) 306-9822

Mr. Fountain is an employee of Buckeye who has knowledge regarding the damage caused by Enduro's tool to the pipeline, the work performed on the pipeline at issue, the bid process for the 2015 inline inspection, the vendors that decided not to bid on the inline inspection due to the presence of the magnets and the cost to repair the damage to the pipeline due to the movement of the magnets both past and future. Mr. Fountain further has knowledge of conversations with Enduro personnel related to the work it performed on the pipeline as well as conversations with Rosen USA regarding its refusal to complete an inline inspection in 2015. He is expected to provide testimony regarding same.

8. Jim Furr
Enduro Pipeline Services, Inc.
c/o Dick R. Holland
R. Layne Rouse
700 N. Grant Avenue, Suite 201 (79761)
P.O. Drawer 1552
Odessa, Texas 79760-1552
Phone: (432) 250-6515

Mr. Furr has knowledge of the work performed by Enduro on the pipeline at issue, conversations with PMI and Buckeye regarding same and the fabrication and design of Enduro tools/pigs utilized on the pipeline at issue. He is expected to provide testimony confirming he acknowledged that the magnets at issue were lost in PMI's pipeline due to errors during assembly of the magnet tool by Enduro personnel and conversations he had with PMI personnel wherein he represented the magnets would not move due to their strength.

9. Dong-Hyeon ("DJ") Joh
P.M.I. Services North America, Inc.
c/o Christine Kirchner
Cade W. White
1200 Smith Street, Suite 1400
Houston, Texas 77002
Telephone: (713) 658-1818

Mr. Joh is an employee of Plaintiff who has knowledge regarding the damage to PMI's pipeline, conversations with Enduro and Buckeye about same, and the costs incurred by Plaintiff in the past as well as the costs to be incurred in the future due to the movement of magnets within the pipeline. He is expected to provide testimony regarding same.

10. Christine Kirchner
Chamberlain, Hrdlicka, White, Williams & Aughtry
1200 Smith Street, Suite 1400

Houston, Texas 77002
Phone: (713) 658-1818

Ms. Kirchner is an attorney for PMI and has knowledge regarding the reasonableness and necessity of the attorneys' fees and costs incurred by PMI. She is expected to provide testimony regarding the reasonable and necessary attorneys' fees and costs incurred by PMI in pursuing this claim.

11. Darryl Knee
Buckeye Development and Logistics, LLC
One Greenway Plaza, Suite 880
Houston, Texas 77046
Phone: (832) 615-8600

Mr. Knee is an employee of Buckeye who has knowledge regarding the damage caused by Enduro's actions to the pipeline and the costs to repair the pipeline. He is expected to provide testimony regarding same.

12. Dwayne Laymon
Enduro Pipeline Services, Inc.
c/o Dick R. Holland
R. Layne Rouse
700 N. Grant Avenue, Suite 201 (79761)
P.O. Drawer 1552
Odessa, Texas 79760-1552
Phone: (432) 250-6515

Mr. Laymon is the President of Enduro and has knowledge regarding the fabrication and design of Enduro tools that were used on the pipeline and conversations with PMI regarding the damage to the pipeline. He is expected to provide testimony regarding same.

13. Otty H. Medina, Sr.
Buckeye Development and Logistics, LLC;
One Greenway Plaza, Suite 880
Houston, Texas 77046
Phone: (832) 615-8600

Mr. Medina is an employee of Buckeye who has knowledge regarding the work performed by Enduro on the pipeline at issue and conversations with PMI and Enduro regarding Enduro's failure to properly secure magnets on its magnet tool. He further has knowledge regarding the launch procedures utilized by Buckeye when launching a tool through the pipeline, Rosen's refusal to complete the inline inspection, and the excavation work performed that confirmed an obstruction identified in the pipeline was actually a magnet. He is expected to provide testimony regarding same.

14. Darryn Tollefson
P.M.I. Services North America, Inc.
c/o Christine Kirchner
Cade W. White
Chamberlain, Hrdlicka, White, Williams & Aughtry
1200 Smith Street, Suite 1400
Houston, Texas 77002
Phone: (713) 658-1818

Mr. Tollefson is an employee of Plaintiff who has knowledge regarding the work performed by Enduro on the pipeline at issue, conversations with Buckeye and Enduro personnel regarding same, damage to Plaintiff's pipeline, including when such damage was learned, and the costs to repair the pipeline. He is expected to testify regarding the above-referenced issues and that PMI relied on representations made on behalf of Enduro in deciding not to remove the magnets in 2010 was unaware that a vendor would be unwilling to complete an inline inspection due to the presence of the magnets, thereby risking a shutdown of the pipeline, until July of 2015.

15. Joey Trevino
Rosen USA
14120 Interdrive East
Houston, Texas 77032
(281) 442-8282

Mr. Trevino has knowledge regarding the work performed by Rosen on the pipeline in 2015 and conversations with Buckeye regarding same. He is expected to provide testimony regarding same.

16. Any witness designated by Defendant (live or by deposition).

Respectfully submitted,

CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, P.C.

By: /s/ Christine Kirchner
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I do hereby certify that on this 20th day of November 2017, the foregoing was filed in this matter via the Court's CM/ECF system, which will electronically notify all counsel of record of the filing.

/s/ Christine Kirchner

Christine Kirchner

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